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File

WATER COMPLIANCE BRANCH

EPA I.D. NO: MOD092341642

Mr. Phillip McKersie  
Georgia Pacific Corporation  
40 Merchant Street  
P. O. Box 427  
Ste. Genevieve, MO 63670

Missouri I.D. NO: 01659

Dear Mr. McKersie:

Enclosed please find a copy of the "Closure Plan Cost Review" regarding the Georgia-Pacific Corporation Closure Plan dated September 1, 1982. These review comments which were developed by a U.S. EPA contractor should be self-explanatory.

The Missouri Department of Natural Resources has been authorized to transmit these review comments and take follow-up action on any compliance response by your facility.

Georgia Pacific Corporation must address the deficiencies noted in the "Closure Plan Cost Review" and provide the Missouri Department of Natural Resources with an amended closure plan. Sixty (60) days from the date of this letter please provide us with the details called for by the narrative in items 1 thru 7.

Send all documentation concerning closure plans to Wolfgang A. Scheucher of this office.

If you have any questions or if we can be of further assistance to you, please contact Mr. Scheucher.

Sincerely,

Wolfgang A. Scheucher  
Environmental Specialist  
Waste Management Program

WS/bki

Enclosure

cc: U.S. EPA Region VII ✓  
Poplar Bluff Regional Office  
Arthur Groner



R00016235  
RCRA Records Center

EPA-ARWM/WMBR

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Region VII K.C., MO

MISSOURI DEPARTMENT OF NATURAL RESOURCES  
P.O. Box 1368  
1915 Southridge Drive  
Jefferson City, Missouri 65102  
(314) 751-3241

Christopher S. Bond Governor  
Fred A. Lafser Director

Division of Environmental Quality  
Robert J. Schreiber Jr., P.E. Director

CLOSURE PLAN  
GEORGIA-PACIFIC CORPORATION  
ST. LOUIS, MISSOURI  
(MODO46376398)

A. General

This plan is being prepared in accordance with the requirements of 40 CFR 265.112 through 265.115. This plan identifies all steps that will be necessary to completely close the facility at the end of its intended operating life. A post-closure plan is not required because this is not a disposal facility and all wastes are being removed at closure.

Georgia-Pacific will maintain an on-site copy of the approved closure plan and all revisions to the plan until the certification of closure completeness has been submitted and accepted by the U. S. EPA, Region VII and/or the Missouri DNR. Georgia-Pacific will notify the U. S. EPA and/or Missouri DNR at least 180 days prior to the date we expect to begin final closure. Upon completion of closure, Georgia-Pacific will submit to the Regional Administrator a certification by both Georgia-Pacific and a registered professional engineer that the facility has been closed in accordance with the specifications in the approved plan.

B. Performance Standard

This closure plan was designed to ensure that the facility will not require further maintenance and control, eliminates any threats to human health or environment, and avoids escape of hazardous waste, hazardous waste constituents, leachate, contaminated rainfall, or groundwater contamination. If there is any evidence of contamination, spills, or leaks, samples will be taken and analyzed to determine the extent of contamination. Accordingly, appropriate action will be taken to remove any significant contamination or residue and disposed in an approved disposal facility.

C. Partial Closure

Partial closure of this facility is not applicable and full closure will be implemented only at the end of its useful life.

D. Maximum Waste Inventory

The following lists the maximum inventory of wastes in storage at any given time during the operating life of the facility:

drum storage facility = 40 drums (55 gal.)  
= 2,200 gallons

E. Closure of Drum Storage Facility

All of the drums in the drum storage area will be removed for disposal in an off-site approved hazardous waste disposal facility. The drums will be moved utilizing a forklift. If there is any evidence of spills, leaks, or contaminated material remaining in the storage area, the storage area will be decontaminated with a series of solvent washes. All wastewater and residues generated from cleanup will be collected and sent to a hazardous waste disposal facility.

F. Closure Schedule

Within 90 days after receipt of the final volume of hazardous wastes, final closure will be initiated. Completion of the closure will be within 180 days of this occurrence. The U. S. EPA and/or Missouri DNR will be notified by Georgia-Pacific 180 days before final closure initiation. Final closure will be certified by a registered professional engineer.

G. Post-Closure Plan

Post-closure plans and care is not applicable to this facility since it is not a disposal facility.

H. Notice in Deed

A Notice in the deed in the event of the sale of the property by Georgia-Pacific is not applicable, since it is not a disposal facility.

I. Closure Cost Estimate

An estimated \$3,000 (September, 1982) will be needed to close these facilities, as described herein. Activity estimates include removal of waste inventory, decontamination, and closure certification. The following is a cost breakdown:

- a) Removal and disposal of waste inventory  
40 drums @ \$50/drum = \$ 2,000
- b) Decontamination
  - Sampling and analysis = (in-house)
  - Removal of piping = (in-house)
  - Cleanup of spills, leaks, etc. = 1,000
- c) Certification and Professional Services = (in-house)
- Total Closure Cost Estimate = 3,000

J. Closure Financial Requirements

Georgia-Pacific Corporation has demonstrated to EPA and applicable State agencies that the financial test in accordance with CFR 264 and 265 will be met for liability coverage and closure care on all Georgia-Pacific facilities.